

**Professional Census 2000
222 S. Hill Street, 7th Floor
Los Angeles, California 90012
(213) 485-0447**

August 3, 2000

John H. Thompson
Associate Director for Decennial Census
Bureau of the Census, Building 2, Room 3586
Suitland and Silver Hill Roads
Suitland, Maryland 20233

Re: Comment Letter Regarding Secretary of Commerce's proposed rule

Dear Mr. Thompson:

We are writing in response to the "Request for Comments on the Proposed Rule" published in the Federal Register on June 20, 2000 by the Secretary of Commerce regarding the procedure for release of the corrected data file for Census 2000. The Secretary of Commerce has wisely determined that the best people to make such a decision are at the Census Bureau. The proposed rule delegates to the Director the authority to make the decision on the release of the corrected data after receiving a report from a team of statistical experts from the Bureau. This team is made up of researchers and scientists who have spent years doing research on the use of statistical methods to increase the accuracy of the Census.

Since 1940 when the undercount was first measured, the Census has systematically missed minorities and poor people at a far higher rate than the population as a whole. Such a bias in the Constitutionally-mandated enumeration is an intolerable condition which the Census Bureau has worked for decades to overcome. A procedure called Dual Systems Estimation (DSE) can compare a scientifically drawn sample of the population with the direct results from the Census to produce more accurate and reliable population data. Such a process is now being implemented by the Bureau with advice from the National Academy of Sciences and other statistical experts.

The proposed procedure for delegating the decision on the release of the corrected data for Census 2000 to the Director of the Census Bureau, upon the recommendation of his professional staff, removes the hands of politics from what should be a scientific decision. The Director of the Census Bureau has set forth in his Statement on the Feasibility of Using Statistical Methods to Improve the Accuracy of

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Census 2000 (which accompanied this "Request for Comments on the Proposed Rule") the critical factors to be considered by the Census Bureau in determining whether the corrected data most accurately reflects the U.S. population. If the statistical experts at the Bureau are satisfied that the criteria are met, then the decision to issue the corrected data can be made as a matter of course. We heartily support the Secretary of Commerce in his proposal to set forth a fair and unbiased procedure for making such a vital decision, and we urge final adoption of the rule.

Sincerely,

Dr. Barbara Everitt Bryant
(Director, Bureau of the Census, 1989-91)

Dr. Martha Farnsworth Riche
(Director, Bureau of the Census, 1994-98)

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11314

See Attached List of Signatories

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Additional signatories to August 3, 2000 Letter to John Thompson. Affiliations are noted solely for purposes of identification.

Heidi Aggeler, Associate
BBC Research & Consulting
Denver, Colorado

Glenda Ahhaitty, Chair
Los Angeles American Indian Women's Leadership Forum
Hacienda Heights, California

Dr. Adelamar N. Alcantara, Senior Demographer
Bureau of Business & Economic Research
University of New Mexico
Albuquerque, New Mexico

Susan Alibozek
Department of Planning & Development
Montgomery County, New York

Dr. Albert F. Anderson, Director of Research
Public Data Queries, Inc.
Ann Arbor, Michigan

Dr. Janet Baldwin Anderson
Education Statistics Services Institute
American Institutes for Research

Dr. Margo J. Anderson
Department of History
University of Wisconsin
Milwaukee, Wisconsin

Mary Batcher
Ernst & Young LLP
Washington, DC

Patricia C. Becker, APB Associates
SEMCC
Southfield, Michigan

John H. Thompson
Associate Director for Decennial Census
Page 4

Neel Bhattacharjee
Population Reference Bureau
College Park, Maryland

Lynne Billard, Past President, 1996
American Statistical Association
University of Georgia

John G. Blodgett
Office of Social & Economic Data Analysis
University of Missouri
Columbia, Missouri

Peter Fonda-Bonardi
Research and Urban Development
Los Angeles County
Los Angeles, California

Daniel Borough, Student
Arizona State University

Dr. John J. Bosley
Bureau of Labor Statistics
Kensington, Maryland

Brian Bresolin

Peter B. Case, Manager of Sampling Services
Roper Starch Worldwide, Inc.

Andrew Cherlin, Professor of Public Policy
Department of Sociology
Johns Hopkins University
Baltimore, Maryland

Dr. Judy Chu, City Councilmember
Monterey Park, California

Joel E. Cohen
Rockefeller University
New York, New York

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Associate Director for Decennial Census
Page 5

Parker Collins
Alabama Department of Economic & Community Affairs
Montgomery, Alabama

Judith M. Conn, Statistician
Centers for Disease Control
Atlanta, Georgia

Leida Martinez-Cortes
Office of the Census
Puerto Rico Planning Board

Dr. James C. Creech, Manager Research Unit
Virginia Criminal Sentencing Commission
Richmond, Virginia

Beverly M. Daly, Assistant Director
Kentucky State Data Center
Louisville, Kentucky

Sally Daniels, Senior Research Director
Roper Starch Worldwide
New York, New York

James M. Davenport
Department of Mathematical Sciences
Virginia Commonwealth University
Richmond, Virginia

Maxine Denniston, Senior Biostatistician
American Cancer Society Behavioral Research Center
Atlanta, Georgia

Emily Diggins, Research Assistant
Education Statistics Services Institute
Washington, DC

JoAnn L. Dionne, Social Science Data Librarian
University of Michigan
Ann Arbor, Michigan

John H. Thompson
Associate Director for Decennial Census
Page 6

Dennis L. Dunlap
American Marketing Association
Chicago, Illinois

Dr. Nancy Dunton, Director
Center for Health & Social Research
Midwest Research Institute
Kansas City, Missouri

Dr. Douglas L. Eckberg, Professor and Chair
Department of Sociology
Winthrop University
Rock Hill, South Carolina

Barry Edmonston, Director
Population Research Center
Portland State University
Portland, Oregon

Dr. Samia El-Badry, Vice President and Director of Operations
Teknecon Energy Risk Advisors LLC

Dr. Jonas H. Ellenberg, Past President, 1999
American Statistical Association

Michael J. Etzel, Professor Marketing
Department of Marketing
University of Notre Dame

Gerald L. Euster, DSW, Director
South Carolina Center for Gerontology
Columbia, South Carolina 29208

Reynolds Farley, Professor/Research Scientist
Population Studies Center
Institute for Social Research
University of Michigan
Ann Arbor, Michigan

John H. Thompson
Associate Director for Decennial Census
Page 7

David Featherman, Director
Institute of Social Research & Psychology
University of Michigan
Ann Arbor, Michigan

Dr. David J. Fitch, Statistician
Instituto de Nutricion de Centro America y Panama
Guatemala, Central America

Theodore D. Fuller, Professor/Graduate Director
Department of Sociology
Virginia Technical Institute
Blacksburg, Virginia

Dr. Carolyn L. Funk, Associate Professor
Science & Public Administration/ Director of The Commonwealth Poll
Political Center for Public Policy
Virginia Commonwealth University
Richmond, Virginia

Dr. Gregory H. Gaertner, Vice President
The Gallup Organization
Rockville, Maryland

Andrew R. Gatewood, Vice President
United Way Community Services, Info & Research Services
Detroit, Michigan

Dr. Alicia Schoua-Glusberg
Project on Human Development in Chicago Neighborhoods
Harvard University

Katherine Graham
Oakland County Planning & Economic Development
Pontiac, Michigan

Dr. Patricia M. Guenther, Survey Methodologist; Member
Survey Research Methods Section, American Statistical Association
Salt Lake City, Utah

James K. Hahn
City Attorney, Los Angeles, California

John H. Thompson
Associate Director for Decennial Census
Page 8

Jessica F. Heinz
Assistant City Attorney, Los Angeles, California

Barbara Hempill, Census Project Manager
City of Livermore, California

Philip Hernandez, Executive Director
Denver Agency for Human Rights and Community Relations

Dr. Ellen Hertz
Washington Statistical Society
Arlington, Virginia

Milla H. Hill
Arizona Department of Environmental Quality

Ken Hodges
Claritas, Inc.
Ithaca, New York

Dr. Kim Hopper, Research Scientist
Nathan Kline Institute
Orangeburg, New York

Scott Howard, City Attorney
City of Glendale, California

Tom Jabine, Statistical Consultant
Washington, DC

Illene Jacobs, Director of Litigation
Advocacy & Training
California Rural Legal Assistance, Inc.
Marysville, California

Don Jang
Mathematica Policy Research, Inc.

Craig Jenkins, Professor of Sociology
Ohio State University
Columbus, Ohio

John H. Thompson
Associate Director for Decennial Census
Page 9

Gerald A. Joireman, Statistician
Division of Tribal Services
Office of Community Services
Washington, DC

Dr. Ted S. Jojola, Professor
School of Architecture & Planning
University of New Mexico
Albuquerque, New Mexico

William D. Kalsbeek, Director/Professor
Survey Research Unit
Department of Biostatistics
University of North Carolina
Chapel Hill, North Carolina

Dr. William Kandel, Research Associate
Public Private Ventures
Philadelphia, Pennsylvania

John Karnuth
Department of Planning & Development
City of Chicago
Chicago, Illinois

Robert Kaufman, Professor
Department of Sociology
Ohio State University
Columbus, Ohio

Edward B. Keller, President
Roper Starch Worldwide, Inc.
Washington, DC

John M. Kennedy, Director
Center for Survey Research
Indiana University
Bloomington, Indiana

Dr. Edward A. Kirt, Principal Statistician
Detroit Health Department
Detroit, Michigan

John H. Thompson
Associate Director for Decennial Census
Page 10

James R. Knaub, Jr.
ASA and WSS

Noella Kong

Bill Kraynak, State Census Liaison
Office of Policy & Management
Hartford, Connecticut

Dr. Karen Woodrow-Lafield, Associate Professor
Department of Sociology, Anthropology
and Social Work
Mississippi State University

Charles W. Lanier, Statistician/Governor's Liaison Census 2000
North Carolina Office of State Planning State Data Center
Raleigh, North Carolina

Mike Lettre, Assistant Director
Maryland Office of Planning
Baltimore, Maryland

Bart B. Lewis, Chief, Research Division
Atlanta Regional Commission
Atlanta, Georgia

Wenlin (Wayne) Liu, Senior Economist
Division of Economic Analysis
Wyoming Department of Administration & Information
Cheyenne, Wyoming

John R. Logan, Professor/Director
Department of Sociology
Lewis Mumford Center for Comparative Urban and Regional Research
University of Albany
Albany, New York

Peter Lynn, Director
Survey Methods Centre
National Centre for Social Research
London, United Kingdom

John H. Thompson
Associate Director for Decennial Census
Page 11

Mike MacFarlane, State Demographer
South Carolina State Data Center
Columbia, South Carolina

Bette S. Mahoney
Washington, Virginia

Michele Fox Melendez, MPH, CHES
HIV/AIDS Epidemiologist
Detroit, Michigan

Kurt R. Metzger, Director
Michigan Metropolitan Information Center/ Center for Urban Studies
Wayne State University
Detroit, Michigan

Berna Miller, Research Manager
Strategic Resources Group Claritas
San Diego, California

Javier Minjares, Senior Planner
Southern California Association of Government
Los Angeles, California

Dr. JoLynn Pratt Montgomery, MPH
Detroit, Michigan

Dennis Moody
Information Technology Agency
Los Angeles, California

David S. Moore, Past President, 1998
American Statistical Association

David Morganstein, Past Treasurer
American Statistical Association

Michael Munk, Manager
Demographic & Information System
Alameda County Community Development Agency
Hayward, California

John H. Thompson
Associate Director for Decennial Census
Page 12

Mary Murray
Oakland County Planning and
Economic Development Services
Pontiac, Michigan

Joan Naymark
Target Corporation

Dr. Lisa Neidert, Senior Research Associate
Population Studies Center Institute of Social Research
Data Archive & Data Support
University of Michigan
Ann Arbor, Michigan

Megumi Omori
Department of Sociology
University of South Carolina
Columbia, South Carolina

Thomas Piazza, Senior Survey Statistician
Survey Research Center
University of California Berkeley
Berkeley, California

Kelvin M. Pollard, Research Demographer
Population Reference Bureau

Dudley L. Poston, Jr.
Department of Sociology
Texas A&M University

Sandra Rivea, Senior Planner
Alameda County Community Development Agency

Richard C. Rockwell, Professor of Sociology
University of Connecticut

Larry Rodgers, Administrator
Utah Navajo Trust Fund
Former Statistician, Navajo Nation Government

John H. Thompson
Associate Director for Decennial Census
Page 13

James B. Rogers, Data Center Manager
Southeast Michigan Council of Government
Detroit, Michigan

Robert S. Ross, Professor and Chair
Department of Political Science
Director, Social Science Survey Center

Suzanne Ryan
Carolina Population Center
University of North Carolina
Chapel Hill, North Carolina

Jennifer Sable
Education Statistics Service Institute
Washington, DC

Dr. David S. Sawicki, Professor
City Planning & Public Policy Programs
Georgia Institute of Technology
Atlanta, Georgia

Robert Scardamalia

Ronny Schaul, Senior Statistician
Baltimore, Maryland

Charles L. Schultze, Senior Fellow Emeritus
The Brookings Institution
Washington, DC

Carol Z. Shea
Smyth Marketing Resources
Cincinnati, Ohio

Jim Skinner, Principal Planner, Research
Atlanta Regional Commission
Atlanta, Georgia

John H. Thompson
Associate Director for Decennial Census
Page 14

Stan K. Smith, Professor/Director
Bureau of Economic & Business Research
University of Florida
Gainesville, Florida

Dr. Jennifer Solomon
Winthrop University
Rock Hill, South Carolina

Rosann Spiro
American Marketing Association
Chicago, Illinois

Glenna Spitze
Department of Sociology
SUNY Albany
Albany, New York

Charlotte Steeh, Survey Director
Applied Research Center
Georgia State University

Duane Steffey
Department of Mathematical and Computer Sciences
San Diego State University

Dr. Michael A. Stoto, Professor/Chair
Department of Epidemiology & Biostatistics
School of Public Health and Health Services
George Washington University
Washington, DC

R. Suresh
Research Triangle Institute
Research Triangle Park, North Carolina

David A. Swanson, Dean
Administration International Center
Helsinki School of Economics & Business International Center
Mikkeli, Finland

John H. Thompson
Associate Director for Decennial Census
Page 15

Bonnie Tang
Asian Pacific American Legal Center
Los Angeles, CA

Dr. Judith Tanur, Professor
Department of Sociology
State University of New York
Stony Brook, New York

Jeff Tayman

Paul A. Teixeira, MPH
Joseph L. Mailman School of Public Health
Columbia University
New York, New York

Steve Tokarchuk, Geographer
Urban Science, Inc.
Detroit, Michigan

Robert D. Tortora, Chief Methodologist
The Gallup Organization

Dr. C. Jack Tucker
Professor of Sociology
Winthrop University
Rock Hill, South Carolina

William L. Urton
Columbia, South Carolina

Dan Veroff, Extension Demographic Specialist
Applied Population Lab, Department of Rural Sociology
University of Wisconsin, Madison

Marlys Vickers, Supervisor Marketing & Research
Oakland County Planning & Economic Development
Services Division
President, Southeast Michigan Census Council
Pontiac, Michigan

John H. Thompson
Associate Director for Decennial Census
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John P. Vidmar, Vice President
Public Sector Research Group
Market Facts, Inc.

The Honorable Antonio Villaraigosa, Speaker Emeritus
California State Assembly
Sacramento, California

Dr. Lynda Voigt
Fred Hutchinson Cancer Research Center
Seattle, Washington

Glenn D. White, Jr.
Ernst & Young
Washington, DC

Dr. Ronald C. Wimberley
William Neal Reynolds Professor of Sociology
Department of Sociology and Anthropology
College of Agriculture and Life Sciences
North Carolina State University

Othmar W. Winkler, Professor Emeritus
The McDonough School of Business
Georgetown University
Washington, D.C.

Ernest R. Yazzie, Statistician
Division of Community Development
of the Navajo Nation
Window Rock, Arizona

Benjamin O. Young
American Institutes for Research
Washington, DC

Curtis Zunigha, Member of
Race and Ethnic Advisory Committee to Census 2000
American Indian/ Alaska Native Populations
Tulsa, Oklahoma